

Before the

DA

local exchange carriers' ("LECs") interconnection tariffs. Regardless of the fact that Ameritech emphatically denies that there is anything wrong with its interconnection rates, that investigation itself constitutes no justification for delaying the corrective action of the GSF Order. The GSF Order, after all, merely corrects the previous intentional underallocation of GSF investment and related cost to the common line category – i.e., it simply eliminates an intentional subsidy from all other interstate rate elements to common line. In economic terms, the decision is justified in its own right. As the Commission noted;

The revised rule will allocate costs among service categories in a manner that will result in more cost-based rates for access services. Correcting these misallocations will make access services more efficiently priced, which will stimulate additional usage of the access network by those services whose rates are lowered as a result.⁵

Thus, while the Commission's decision has the additional benefit of eliminating a subsidy burden on LEC competitive services that does not exist for their competitors, that, by itself, constitutes no valid justification for delaying the changes while the Commission investigates the LECs' interconnection rates.

In light of the foregoing, MFS's petition for reconsideration should be denied.

Respectfully submitted,



Michael S. Pabian
Attorneys for the
Ameritech Operating Companies
Room 4H76
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025
(708) 248-6044

Dated: July 27, 1993

⁵ GSF Order at para. 11.

CERTIFICATE OF SERVICE

I, Jenell Thompson, do hereby certify that copies of the foregoing pleading has been served to the parties listed below by first class mail, postage prepaid, on this 27th day of July, 1993.

By: Jenell Thompson
Jenell Thompson

Andrew D. Lipman
Russell M. Blau
Swidler & Berlin, Chartered
3000 K Street, N.W.
Washington, DC 20007

Cindy Z. Schonhaut
MFS Communications Company, Inc.
3000 K Street, N.W., Suite 300
Washington, DC 20007